

EXHIBIT 62

Case:17-03283-LTS Doc#:20646 Filed:04/29/22 Entered:04/29/22 15:26:13 Desc:
Main
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO
as representative of
THE COMMONWEALTH OF PUERTO RICO, et
al.,

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA

RECEIVED
U.S. DISTRICT COURT
MAY 20 2022
2022 BK 3283 LTS
PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)
This filing relates to PREPA

**REPLY TO "FOUR HUNDRED FORTY-EIGHT OMNIBUS OBJECTION
(SUBSTANTIVE) OF PUERTO RICO ELECTRIC POWER AUTHORITY (Docket No.
20504)**

NOW APPEARS Miriam Sanchez Lebron, representing herself (pro se), and
hereby **objects** the decision taken by the public corporation Puerto Rico Electric Power
Authority ("PREPA"), dependency of the **COMMONWEALTH OF PUERTO RICO**.

The facts of my claim are based **not** only on a third party, but on violations to
our civil and constitutional rights through the **Department of General Justice**,
dependencies of the Commonwealth of Puerto Rico and in a conspiracy with a **third
party** to mutually benefit themselves.

The concerns Deed No. twenty (20) of **Participation and Adjudication of
Hereditary Assets**, in the name of **Juana Lebron Perez**, dated August 1st, 1955,
executed before Notary Aguedo Mojica Marrero. Where three (3) resolutions are
mentioned that should have been in the file **CS55-413** of which only the one from June

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24, 1955, appeared. The other two under the custody of the **Superior Court of Humacao** have been missing or hidden by the Court's administration, for decades, dated April 29 and July 10, 1955. Of all this I have substantial evidence. The result of all this is that the Commonwealth of Puerto Rico is responsible for the fact that my family does not have the evidence necessary to show that part of the assets of the public corporation PREPA the legal owner is Mr. Eadio Lebron, my grandfather and he also owns a participation in the bonds issued by the corporation.

Wherefore my request to the COMMONWEALTH OF PUERTO RICO is that they locate the resolutions dated April 29 and July 10, 1955, so as they do not continue to violate our civil and constitutional rights, so they corroborate that our claims are fair and truthful. And that justice is made in this case where there was a **conspiracy and several violations where the third party was not the only one who incurred in this offense.**

For these reasons I request this Honorable Court that accept our objection to the decision taken by the Oversight Board and to **reconsiders its decision.** They should visualize and analyze with the above-mentioned **third party** and its extensive business relationship, some legal other illicit, led by the Commonwealth of Puerto Rico and the public corporation PREPA so it produces our claim.

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Cc: Copy of Deed 20 and the only resolutions that appears dated June 24, 1955.

Respectfully submitted:

Date April 29, 2022



MIRIAM SANCHEZ LEBRON (CLAIM NO. 17433)

HC-04 BOX 4001

HUMACAO, PUERTO RICO 00791-8900

Copy to: Counsel for the Oversight Board

Proskauer Rose LLP

Eleven Times Square

New York, New York 10036-8299

Attn: Martin J. Bienenstock, Ehud Barak and Paul V. Possinger

Counsel for the Creditors' Committee

Paul Hastings LLP

200 Park Avenue

New York, New York 10166

Attn: Luc A. Despins, James Bliss, James Worthington, G. Alexander Bongartz

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EXHIBIT NUMBER 4

OPTIMUS OPTABILIUS

Aguedo Mojica Marrero

ATTORNEY - NOTARY
NOYA Y HERNÁNDEZ No. 54, ALTOS
HUMACAO, PUERTO RICO

[Seal of Puerto Rico]

Deed No. TWENTY

REGARDING

PARTITION AND ADJUDICATION OF ESTATE

Entered by Saturnina Ortíz, Widow of Lebrón, William

Lebrón Colón, and Juana Lebrón Pérez

[handwritten:] sole owner

August 1st 1955

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NUMBER TWENTY
ESTATE PARTITION AND ADJUDICATION DEED

On the first of August, nineteen hundred and fifty-five, in Humacao, Puerto Rico, the following persons appeared before me, AGUEDO MOJICA MARRERO, civil-law notary on the Island of Puerto Rico, domiciled, resident and with offices at number fifty-four calle Noya & Hernandez, Humacao, Puerto Rico, and the witnesses who are listed at the end of this document:

MRS. SATURNINA ORTIZ, Widow of Lebrón, adult, homemaker, and resident of Humacao, Puerto Rico;

MR. WILLIAM LEBRÓN COLÓN, of age, married, property owner and resident of Yabucoa, Puerto Rico;

AND MRS. JUANA LEBRÓN PEREZ, of age, married, homemaker, resident of Humacao, Puerto Rico.

I, the civil-law Notary, hereby certify that the ages, marital statuses, professions, and residences of the persons appearing are known to me from their declarations. I have ascertained that they are fully entitled to exercise their civil rights without having established anything to the contrary. Given that I consider that they have the necessary capacity to execute this deed, they freely make the following statements:

ONE: Mr. Eladio Lebrón died intestate in Humacao, Puerto Rico on March eighteenth, nineteen hundred and fifty-five, and left the following assets which are subject to partition:

A. Joint ownership property worth half the value of the following property:

[stamp:] AGUEDO MOJICA
MARRERO [;]
ATTORNEY [;]
CIVIL-LAW
PUERTO
RICO

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FOLIO SIXTY-FIVE

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"RURAL PROPERTY: Reinforced concrete house, zinc-roofed, single story, located on a plot of about a half-acre, belonging to Antonio Roig, Sucre, in the Rio Abajo District of the Humacao municipality, bounded to the north, i.e. its frontage, by the landlocking plot, and the island highway that runs from Humacao to its Beach, to the South and East by Antonio Roig Sucre; and to the West by Hector H. Gonzalez. To the left of this house runs a forest track belonging to Antonio Roig Sucre".

Eladio Lebron acquired this joint property from spouses Rafael Castaneda and Genoveva Figueroa, in accordance with the deed of sale number fifteen executed in Humacao, Puerto Rico, on April twelfth, nineteen hundred and forty-eight before civil-law notary Rafael A. Arroyo Rios in Humacao, Puerto Rico and is not recorded in the Land Register.

B. Benefit received by Eladio Lebrón from the United States Government's Veteran Administration for services rendered as a veteran, deposited by said Veterans Administration with the Clerk of the Honorable Superior Court of Puerto Rico, Humacao Vicinage, according to this Chamber's orders of April twenty-ninth, nineteen hundred and fifty-five and July tenth, nineteen hundred and fifty-five. TWO: On June twenty-fourth, nineteen hundred and fifty-five, in the Superior Court of Puerto Rico, Humacao Vicinage, in a decision in civil case number CS 55-413 in the matter of Declaration of Heirs, the Honorable Luis Pereyo, declared or established the following persons as sole and universal heirs of Eladio Lebrón:

[stamp:] AGUEDO MOJICA
MARRERO [;]
ATTORNEY [;]
PUERTO
RICO

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FOLIO SIXTY-SIX

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his lawful daughter Juana Lebrón Peres, his acknowledged son William Lebrón Colón, and his widow Saturnina Ortiz, all in accordance with the legislation in force at the time of this decedent's demise.

THREE: Given that the persons appearing have agreed as to the value, partition and adjudication of the property described above, in the first paragraph of this expositive section, they hereby undertake all the foregoing in accordance with the following clauses:

ONE: The parties agree as to the following values:

(a) The joint ownership of half the property described in section A of the first section of this deed is assigned a value of SIX HUNDRED DOLLARS-----\$600.00

(b) The total funds deposited with the Clerk of the Superior Court, Humacao Vicinage, is THREE THOUSAND, NINE HUNDRED AND THIRTY-SEVEN DOLLARS AND SEVENTEEN CENTS-----
---\$3,937.17

ALL THE FOREGOING produces a total for the Estate's assets of FOUR THOUSAND, FIVE HUNDRED AND THIRTY-SEVEN DOLLARS AND SEVENTEEN CENTS-----\$4,537.17

TWO: As of this date, the following obligations have been paid from the aforementioned assets:

(A) SEVENTY-ONE DOLLARS AND EIGHTY-FOUR CENTS to Rafael Torrellas, for food items served to Eladio Lebrón up till the day of his demise-----\$71.84

(B) TWO HUNDRED AND FORTY-THREE DOLLARS to Justo Diaz for services concerning the preparation and interment of Eladio Lebrón's remains---\$243.00

THE FOREGOING produced a total for the

[stamp:] AGUEDO MOJICA
MARRERO [;]
ATTORNEY [;]
PUERTO
RICO

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FOLIO SIXTY-SEVEN

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Estate's liabilities of THREE HUNDRED AND FOURTEEN DOLLARS
AND EIGHTY-FOUR CENTS-----\$314.84

THREE: The net value of the assets resulting from the
foregoing items is FOUR THOUSAND, TWO HUNDRED AND
TWENTY-TWO DOLLARS AND THIRTY-THREE CENTS-----
-----\$4,222.33

FOUR: Of this liquid remainder of FOUR THOUSAND, TWO
HUNDRED AND TWENTY-TWO DOLLARS AND THIRTY-THREE
CENTS, half of this amount, TWO THOUSAND, ONE HUNDRED AND
ELEVEN DOLLARS AND SIXTEEN CENTS, is payable to the
Saturnina Ortiz, Widow of Lebrón, by way of community property-----
\$2,111.16

FIVE: The remaining half of the liquid value of the assets
amounts to TWO THOUSAND, ONE HUNDRED AND ELEVEN
DOLLARS AND SEVENTEEN CENTS, and belongs equally to the
following persons appearing: Juana Lebrón Perez and William Lebrón
Colón, and Juana Lebrón Perez's portion is the sum of ONE
THOUSAND, FIFTY-FIVE DOLLARS AND FIFTY-NINE CENTS, and
William Lebrón Colón's portion is the sum of ONE THOUSAND AND
FIFTY-FIVE DOLLARS AND FIFTY-EIGHT CENTS.

SIX: Saturnina Ortiz, Widow of Lebrón and William Lebrón
Colón hereby assign and transfer all their rights and actions over the
property described in the first paragraph of the expositive portion of
this deed to Juana Lebrón Perez to the value of SIX HUNDRED
DOLLARS (\$600.00), thus supplementing the portion apportioned to
said Juana Lebrón Perez according to the previous clause, with the
sum of FOUR HUNDRED AND FIFTY-NINE DOLLARS AND FIFTY-
NINE CENTS (\$459.59), to be paid from the funds deposited with the
Clerk of the [...]

[stamp:] AGUEDO MOJICA
MARRERO [;]
ATTORNEY [;]
PUERTO
RICO

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FOLIO SIXTY-EIGHT

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of the Superior Court, Humacao Vicinage, all reaching a total of ONE THOUSAND AND FIFTY-FIVE DOLLARS AND FIFTY-NINE CENTS-----\$1,055.59

SEVEN: Willian Lebrón Colón's portion amounts to ONE THOUSAND AND FIFTY-FIVE DOLLARS AND FIFTY-EIGHT CENTS and it shall be paid from the funds deposited with the Clerk of the Superior Court, Humacao Vicinage-----\$1,055.58

EIGHT: The share of community property and the portions that are the subject of the foregoing clauses four, five, six and seven amount to FOUR THOUSAND, TWO HUNDRED AND TWENTY-TWO DOLLARS AND THIRTY-THREE CENTS, namely the liquid remainder of the estate-----\$4,222.33

FOUR: Juana Lebrón Perez shall assume the full and absolute ownership of the joint shared ownership of the property described in the foregoing first section of the expositive portion of this deed, without anything other than this deed being required. The parties hereby instruct the recording Notary to submit to the Humacao Superior Court the corresponding motion for the withdrawal of the funds held by the Clerk of said Court, in accordance with the terms of this deed and any other agreements in relation to their respective participations in these funds that the parties may freely agree following the execution of this deed.

THESE are the provisions, agreements, and wishes of the parties, as well as the contracts perfected herein and, the recording Notary having given the relevant legal notices, this is the deed that the parties executed and formalized and which they are bound to observe and remain subject at all times to its consequent legal responsibilities.

[stamp:] AGUEDO MOJICA
MARRERO [;]
ATTORNEY [;]
CIVIL-LAW
PUERTO
RICO

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FOLIO SIXTY-NINE

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THUS STATED before me, the Notary, and before the witnesses, who are of legal age, without legal prohibition to serve as such, and known to me, the Notary, as residents of Humacao, Puerto Rico, Messrs. Lázaro Rivera Lazú and José R. Santisteban.

This Deed was READ by me to the parties and witnesses, all having waived their right to reading it themselves, and was signed by all and initialed by the parties, all of which and the contents herein I, the Notary, do ATTEST TO AND CERTIFY.

SIGNED: Saturnina Ortiz Widow of Lebrón – William Lebrón Colón – Juana Lebrón Pérez – Lázaro Rivera Lazú – José R. Santisteban.

Signed, stamped and sealed: AGUEDO MOJICA MARRERO. Initialed on each page by the grantors. The corresponding Internal Revenue and Attorney Association stamps are present and duly paid off, as well as the Notary stamp.

[tax stamps, illegible]

This is a true and accurate COPY of the contents of the original which is on file in my record of public documents for the year nineteen hundred and fifty-five, to which I refer in issuing this first copy to Juana Lebrón Pérez in Humacao, Puerto Rico, on the same day as the execution of this deed. I DO ATTEST and CERTIFY

[signature]

[signature]
NOTARY PUBLIC

[notary stamp, cancelled]

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IN THE PUERTO RICO SUPERIOR COURT
HUMACAO DIVISION

United States of America
The President of the USA
Commonwealth of Puerto Rico

Saturnina Ortiz, Widow of Lebrón

Petitioner

Ex parte

Civil Case No. CS-55-413

In the matter of:

Declaration of Heirs

DECISION

WHEREAS: The petitioner in this case filed a duly sworn petition in this court alleging that she is an adult, a widow, and resident of Humacao, Puerto Rico, that she was married to Eladio Lebrón on May 1, 1943, and the said Eladio Lebrón died intestate on March 18, 1955 leaving an estate subject to partition.

WHEREAS: The petitioner alleges that Eladio Lebrón was previously married to Margarita Perez and was divorced from her on April 8, 1922, and this marriage produced a daughter named Juana Lebrón Perez, who was born on [REDACTED] 1920.

[stamp:] COMMONWEALTH OF PUERTO RICO [:]
GENERAL COURT OF JUSTICE [:] [illegible]

WHEREAS: The petitioner alleges that Eladio Lebrón had a son named William Lebrón Colón, born of a relationship with Maria Colón Ortiz, and that said William Lebrón Ortiz was born on [REDACTED] 1923 and was acknowledged by his father, Eladio Lebrón.

WHEREAS: A hearing was scheduled in this matter, and witness testimony and documentary evidence was presented in support of the petitioner's requests, and the Court finds that the allegations the application have been proven.

THEREFORE: The Court grants the petition and declares that the sole and universal intestate heirs of Eladio Lebrón are his lawful daughter Juana Lebrón Perez, his acknowledged son William Lebrón Colón and his widow, the petitioner in this matter, Mrs. Saturnina Ortiz, Widow of Lebrón, and each shall receive the portion by way of usufruct determined by law, all in accordance with the statutory provisions in force at the time of said decedent's demise.

Given in Humacao, Puerto Rico, today, June [handwritten:] 24th, 1955.

[tax stamp:] \$3 [:] 3 DOLLARS [illegible]

[signature]
Luis Pereyó
Superior Court Judge

[handwritten:] A0841947
Volume 53 Folio 255

J.284-S. 45-50289-1954-50,000.
Service and Supply Service-Printing Division

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[stamp:] COMMONWEALTH OF PUERTO RICO
Central Filing [;]
JUDICIARY
GENERAL COURT OF JUSTICE

[stamp:] PAID [;]
12918531
[illegible]

PAID 1723329

1723329
5¢ A 5¢

[handwritten:] 12918531
7000154
3479041
1723329

CERTIFICATION

I certify that this is a true and faithful copy of the original document as contained in the record, which I issue at the request of: [handwritten:] Carlos Sánchez Lebrón

WITH PRIOR PAYMENT OF FEES
 FOR OFFICIAL USE, EXEMPT FROM FEES

REQUEST No. [handwritten:] 3965

Given in Hato Rey, Puerto Rico, today OCT 23 1997

[signature]

DOCUMENT ADMINISTRATION
PROGRAM DIRECTOR



T 718.384.8040
W TargemTranslations.com
E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 17433 DN 20646 (PREPA)**

Signed this 18TH of July 2022



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor". A blue line extends from the top left towards the signature.

Andreea I. Boscor

